

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

GLOBAL WOUND CARE MEDICAL GROUP, a
Professional Corporation,¹

Debtor and Debtor in Possession.

Chapter 11

Case No. 24-34908 (CML)

**UNITED STATES' MOTION FOR SUBSTITUTION OF ANDREW WARNER
FOR AUGUSTUS T. CURTIS AS COUNSEL OF RECORD**

The United States of America (the "United States") hereby moves this Court for an order substituting Andrew Warner, a Trial Attorney in the Civil Division of the United States Department of Justice, in place of Augustus T. Curtis, as counsel for the United States in the above-captioned bankruptcy case. Mr. Curtis requests to withdraw as counsel given his impending departure from the United States Department of Justice. Mr. Warner will serve as counsel for the United States following Mr. Curtis' withdrawal, and has filed an application seeking admission *pro hac vice* in the case.

The United States requests that copies of all pleadings and notices filed in this case be served on Mr. Warner electronically (preferred) or at the address below, and that Mr. Curtis be removed from the list of parties to receive notices electronically or otherwise:

Andrew Warner
U.S. Department of Justice
Civil Division
(202) 307-0958 (telephone)
(202) 514-9163 (facsimile)
Andrew.warner@usdoj.gov (e-mail)

¹ The last four digits of the Debtor's tax identification number in the jurisdiction in which it operates is 3572.

P.O. Box 875
Ben Franklin Station
Washington, DC 20044-0875
1100 L Street, NW
Room 7104
Washington, DC 20005
(hand delivery/overnight, if necessary)

Dated: April 4, 2025

Respectfully submitted,
YAAKOV M. ROTH
Acting Assistant Attorney General

/s/Augustus T. Curtis (withdrawing counsel)

KIRK T. MANHARDT
MARY A. SCHMERGEL
AUGUSTUS T. CURTIS
ANDREW WARNER

/s/Andrew Warner (substituting counsel)

KIRK T. MANHARDT
MARY A. SCHMERGEL
AUGUSTUS T. CURTIS
ANDREW WARNER

Commercial Litigation Branch
Civil Division
Department of Justice
1100 L Street, N.W., Room 7208
Washington, D.C. 20044
(202) 598-7524
Attorneys for the United States

CERTIFICATE OF SERVICE

The undersigned hereby certifies that I caused a copy of this Motion to Substitute Counsel to be served on April 4, 2025, upon those parties who have registered for the Court's electronic noticing system (CM/ECF) and by electronic mail on the parties requesting electronic service of notices.

/s/ Augustus T. Curtis
Augustus T. Curtis